

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

CHARLIE JAVICE, OLIVIER AMAR,
CHARLIE JAVICE, in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #1, CHARLIE JAVICE, in her capacity
as trustee of CHARLIE JAVICE 2021
IRREVOCABLE TRUST #2, and CHARLIE
JAVICE in her capacity as trustee of CHARLIE
JAVICE 2021 IRREVOCABLE TRUST #3,

Defendants.

C.A. No. 1:22-cv-01621-MN

AVERMENT PURSUANT TO D. DEL. LR 7.1.1

I, Jacob R. Kirkham, hereby aver that I made a reasonable effort to reach an agreement with Plaintiff's counsel as to the matters set forth in Defendant Olivier Amar's Motion to Partially Lift the PSLRA Discovery Stay to Permit Document Discovery and to Join in Defendant Javice's Motion to Partially Lift the PSLRA Discovery Stay to Permit Document Discovery.

Respectfully Submitted,

KOBRE & KIM LLP

Dated: June 9, 2023

/s/ Jacob R. Kirkham

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